

2688 RF 93

DUE DATE 7-22-93

States Government

Department of Energy

ACTION Benedetti

Memorandum

JUN 22 3 40 PM 1993 Rocky Flats Office

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BENEDETTI, R.L.	<input checked="" type="checkbox"/>	
BENJAMIN, A.		
BERMAN, H.S.		
CARNIVAL, G.J.		
COPP, R.D.		
CORDOVA, R.C.		
DAVIS, J.G.		
FERRERA, D.W.		
HANNI, B.J.		
HEALY, T.J.		
HEDAHL, T.G.		
HILBIG, J.G.		
KIRBY, W.A.		
KUESTER, A.W.		
LEE, E.M.		
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MARX, G.E.		
McKENNA, F.G.		
MORGAN, R.V.		
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SANDLIN, N.B.		
SATTERWHITE, D.G.		
SCHUBERT, A.L.		
SETLOCK, G.H.		
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SULLIVAN, M.T.		
SWANSON, E.R.		
WILKINSON, R.B.		
WILSON, J.M.		
ZANE, J.O.		

Hutchins	<input checked="" type="checkbox"/>
Greengard	<input checked="" type="checkbox"/>
Primrose	<input checked="" type="checkbox"/>
Uess	<input checked="" type="checkbox"/>
Taylor	<input checked="" type="checkbox"/>

CORRES CONTROL	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
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Reviewed for Addressee
Corres. Control RFP

6-22-93
DATE BY

Ref Ltr. #

JUN 17 1993

EG&G
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL

ERD:SG:06772

Operable Unit 2 Surface Water Interim Measure/Interim Remedial Action (IM/IRA)
Notifications and Sample Collection

Robert Benedetti, Associate General Manager
Environmental Restoration Management
EG&G Rocky Flats, Inc.

A statement in your May 26, 1993, letter (93-RF-6538) states that the Operable Unit 2 (903 Pad, Mound, East Trenches) Surface Water Interim Measure/Interim Remedial Action (IM/IRA) Decision Document does not include notification requirements for non-collection of water. Although the IM/IRA does not specifically address notification when we are in non-compliance with the IM/IRA Decision Document, it is important to let EPA and CDH know when we are having technical difficulties that preclude us for collecting water and fulfilling our commitment in the IM/IRA Decision Document. Any non-collection of water could technically be considered a "release" under CERCLA/RCRA and the Interagency Agreement, and timely notification of EPA/CDH is important.

After consultation with EPA and CDH, DOE has agreed to give them notification on a quarterly basis for periods of non-collection. Therefore, starting immediately, EG&G will provide quarterly notification of DOE of periods of non-collection at the IM/IRA of any duration. For periods of non-collection greater than 8 hours, EG&G will verbally notify the DOE Operable Unit 2 manager as soon as possible. Although notification may occur in the weekly status report, formal correspondence is also expected on a quarterly basis. The first quarterly correspondence to DOE will be by September 1, 1993. Subsequent correspondence will be quarterly, from the September date for as long as the IM/IRA is operating.

It also has come to our attention that we are collecting only one sample per week from the effluent, which is contrary to the IM/IRA Decision Document. Section 6.1.2.3 states:

"Following treatment, the water will continuously discharge to South Walnut Creek just down gradient of CS-134. Samples will be collected and analyzed twice per week."

We would like you to resolve why we have not been collecting two samples per week. You will note that the type of analysis is not specified. EG&G is instructed to sample twice a week until the number of samples can be discussed with EPA/CDH.

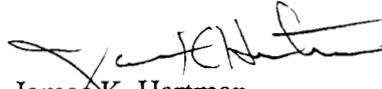
ADMIN RECORD

R. Benedetti
ERD:SG:06772

JUN 17 1993

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If you have any questions, please feel free to contact Scott Grace of my staff at extension 7199.



James K. Hartman
Assistant Manager for Transition
and Environmental Restoration

cc:

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T. Greengard, EG&G
A. Primrose, EG&G
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